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May 21, 2019

VIA ECF

Chambers of Magistrate Judge Ramon E. Reyes, Jr

Re: Proposed Case Management Plan
Freedom Mortgage v. Gregg
Index No.: 19 CV 00861-RRM-RER- (EDNY)

Dear Magistrate Judge:

Enclosed is our proposed case management plan. Plaintiff would not agree to our proposal.

Our client has been through a personal hell recently. His wife received a heart transplant in California, which necessitated him moving out there and leaving his job. He was the head custodian of Hempstead High School and lost his job because the district would not allow him to take any more personal time. His wife recently died, and he moved back to Uniondale. In addition, his daughter has the same condition and recently had a heart surgery. He is in the process of getting his life together and trying to find a new job. He is also suing the school district for how they treated him.

Respectfully, this is an inappropriate borrower for the plaintiff to target with a fast-track federal court foreclosure action. Accordingly, we have proposed dates further in the future on our proposed Case Management Plan to allow for Mr. Gregg a reasonable time to get on his feet so that he can get an adequate job and apply for and get a modification in order to settle the case.

Respectfully submitted,

DAVID L. SINGER, P.C.


By: David L. Singer

Cc: Plaintiff's Counsel via ECF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
FREEDOM MORTGAGE CORPORATION

PROPOSED -
CASE MANAGEMENT PLAN

Docket Number: 19-cv-861

Plaintiff,

-against-

TIMOTHY GREGG, NASSAU COUNTY

CI FRK

Defendant,
-----X

Upon consent of the parties, it is hereby ORDERED as follows:

1. Defendants shall answer or otherwise move with respect to the complaint by 5/3/19.
2. No additional parties may be joined after 6/28/19.
3. No amendment of the pleadings will be permitted after 8/30/19.
4. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: 6/17/19.
5. The parties shall make required Rule 26(a)(2) disclosures with respect to:
 - (a) expert witnesses on or before N/A.
 - (b) rebuttal expert witnesses on or before N/A.
6. All discovery, including depositions of experts, shall be completed on or before 10/14/19 (Generally, this date must be no later than 6 months after the initial conference).
7. Pre-motion letters regarding proposed dispositive motions must be submitted within one (1) weeks following the close of all discovery and responses are due one week later.
8. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)?
(Answer no if any party declines to consent without indicating which party has declined.)

Yes No

If parties answer yes, then fill out the **AO 85 (Rev. 01/09) Notice, Consent, and Reference of a Civil Action to a Magistrate Judge** form. The form can be accessed at the following link:
<http://www.uscourts.gov/uscourts/FormsAndFees/Forms/AO085.pdf>.

9. A Telephone Conference set for 10/14/19, to be initiated by

Plaintiff or Defendant (Check One).

* (The Court will schedule the conference listed above.)

10. Status Conference will be held on 11/18/19.

* (The Court will schedule the conference listed above)

11. A Final Pre-trial Conference will be held on 12/16/19.

* (The Court will schedule the conference listed above.)

This scheduling order may be altered or amended upon a showing of good cause not foreseeable at the date hereof.

Dated: Brooklyn, New York

RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE

CONSENTED TO:

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